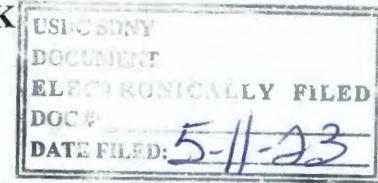


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
CERVECERÍA MODELO DE MÉXICO, :
S. DE R.L. DE C.V., :
Plaintiff, :
v. :
CB BRAND STRATEGIES, LLC, :
CROWN IMPORTS LLC, and :
COMPAÑÍA CERVECERA DE :
COAHUILA, S. DE R.L. DE C.V., :
Defendants. :
----- X



No. 1:21-CV-07316-LAK

JOINT STATUS REPORT AND [PROPOSED] ORDER
EXTENDING TEMPORARY STAY PENDING MEDIATION

WHEREAS, on March 21, 2023, the Court entered an order temporarily extending the stay of this action while the parties pursue good faith settlement discussions using the services of a private mediator (*see* ECF No. 55, the “Stay Order”);

WHEREAS, since the Court issued the Stay Order, the parties have continued their good faith efforts to resolve the entirety of their dispute, including a discussion with the mediator on May 4, 2023, and another mediation session planned for this week;

WHEREAS, the parties believe that continuing their good faith settlement discussions is in the most prudent course of action for resolving their dispute;

WHEREAS, the parties believe that a brief extension of the Stay Order in this action will increase the likelihood that the parties’ ongoing settlement discussions are successful;

WHEREAS, the parties affirm that no party will be prejudiced by this stipulation, and that the stay is intended to facilitate a potential resolution of the above-captioned case rather than cause any undue delay;

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the parties, that, subject to this Court's approval:

1. All proceedings in this action shall continue to be temporarily stayed until June 1, 2023 while the parties engage in settlement discussions.
2. On June 1, 2023, the Parties shall submit a Joint Status Report notifying the Court of the status of the parties' settlement discussions.
3. In the event that the parties are unsuccessful at resolving the entirety of this action, the parties shall request a conference with the Court to set a schedule governing the issues that remain to be adjudicated.

Dated: May 8, 2023

/s/ Michael H. Steinberg

Michael H. Steinberg (*pro hac vice*)
Adam S. Paris
Zachary A. Sarnoff (*pro hac vice*)

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Counsel for Plaintiff Cervecería Modelo de México, S. de R.L. de C.V.

IT IS SO ORDERED:

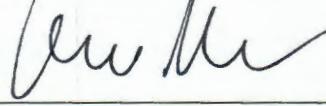
Dated: 5/11/23

/s/ Sandra C. Goldstein

Sandra C. Goldstein, P.C.
Stefan Atkinson, P.C.
Daniel R. Cellucci
Amal El Bakhar

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Imports LLC and Compañía Cervecería
de Coahuila, S. de R.L. de C.V.*


The Honorable Lewis A. Kaplan
UNITED STATES DISTRICT JUDGE